

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHEL ERIC BENNOUCHENE,

Plaintiff,

v.

VIDEOAPP, INC.,

Defendant.

Civil Action No. 19 CV 6318 (GBD)

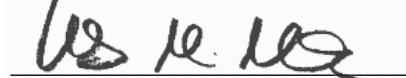
**NOTICE OF MOTION AND MOTION FOR ENTRY OF JUDGMENT
IN A SEPARATE DOCUMENT PURSUANT TO FED. R. CIV. P. 58(d)**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 58, the undersigned attorney for Defendant Videoapp, Inc. will move before the Honorable George B. Daniels, United States District Judge, at the United States Courthouse located at 500 Pearl Street, New York, New York for entry of judgment in a separate document dismissing the Complaint (ECF Doc. No. 1) in its entirety and without prejudice, in substantially the form annexed hereto as Exhibit A.

This motion is based on Plaintiff's voluntary dismissal of all claims on October 7, 2019. (ECF Doc. No. 17.) This motion and the requested judgment are necessitated by Plaintiff's contention that an award of costs to Defendant is premature absent entry of judgment.

DATED: October 28, 2019
New York, New York

MULLEN P.C.



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